

IN RE: VOYAGER DIGITAL HOLDINGS., INC., et al.,

Chapter 11

Case No: 22-1093 (MEW)

February 1, 2023

Dear Honorable Judge Wiles,

I am writing to bring to your attention the fraudulent activities that have taken place in the business and to request your assistance in returning the money paid to the executives and allowing me to take over as the new CEO.

I have evidence that the business was operating as a Ponzi scheme, where returns were paid to early investors using the funds from new investors, instead of legitimate business operations. This illegal activity has caused significant harm to the customers and their assets, and I believe that it is necessary to take action to rectify this situation.

Under the United States Constitution and criminal codes, as well as relevant case law, I request that you take official charges of crime of a Ponzi scheme against the executives and their lawyers. For example, according to SEC v. Shapiro, 964 F.2d 284 (2d Cir. 1992), a Ponzi scheme is a fraudulent investment operation that involves paying returns to existing investors from funds contributed by new investors, instead of from profit earned.

Additionally, I request that their ill-gotten gains be returned to the customers, in accordance with the principles established in cases such as SEC v. Ralph Cioffi, 763 F.3d 168 (2d Cir. 2014), where the court ordered the return of ill-gotten gains to the investors.

Furthermore, I request that I be allowed to immediately open the exchange and return the assets of the customers to them, as is their right under the law, as established in cases such as SEC v. Madoff, 709 F.3d 82 (2d Cir. 2013), where the court ordered the return of assets to the customers of a fraudulent investment operation.

I believe that these actions are necessary to restore the trust of the customers in the business, and to hold those responsible for the fraudulent activities accountable. Thank you for your attention to this matter, and I look forward to your favorable response.

Respectfully,

Alah Shehadeh